

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

ENDLESS RIVER TECHNOLOGIES LLC,	)	
	)	
Plaintiff,	)	Case No. 1:18-CV-00936
	)	
v.	)	JUDGE DONALD C. NUGENT
	)	
TRANSUNION LLC,	)	
	)	
Defendant.	)	

**JOINT MOTION TO EXTEND PRETRIAL DEADLINE**

Plaintiff Endless River Technologies LLC (“Endless River”), and Defendant TransUnion LLC (“TransUnion”) (collectively, the “Parties”), through their undersigned counsel, respectfully move this Court for entry of an Order extending the deadline for filing pretrial motions to September 5, 2022. In support of this motion, the Parties state the following:

1. A one week jury trial is set to commence in this matter on September 12, 2022. Dkt. 178, Dkt. 196.
2. This Court scheduled a *Daubert* hearing for September 1, 2022 to evaluate the admissibility of testimony offered by Endless River’s damages expert, Dr. Andrew Malec. Dkt. 196. There are at least three additional pending motions that also will be discussed at the hearing. *Id.* The Parties anticipate that this Court’s rulings on the pending motions may impact the scope of issues presented at trial and/or the substance of pretrial motions.
3. Pursuant to this Court’s standing order for civil jury trials, “[a]ny pre-trial motion, such as a motion *in limine*, the moving party believes requires the Court’s attention prior to the commencement of trial, shall be filed in writing and served upon opposing counsel at least ten (10) days prior to the scheduled trial date. The nonmoving party shall respond, if desired, at least three

(3) days prior to the scheduled trial date.” Consequently, the deadline for the Parties to serve motions *in limine* is this Friday, September 2, 2022, with oppositions due on September 9, 2022.

4. In light of the fact that this Court’s rulings on September 1, 2022 may impact the scope of issues presented at trial and the substance of pretrial motions, the Parties respectfully request a modest amount of additional time to brief pretrial motions, including any motions *in limine*. Specifically, the Parties request an extension of the deadline for pretrial motions to Monday, September 5, 2022.

5. This modest extension will permit the Parties to fully brief the issues without impacting the oppositions deadline of September 9, 2022.

6. This motion is not being brought for purposes of delay, but rather to allow the Parties sufficient time to incorporate relevant rulings in this case in any pretrial motions.

WHEREFORE, Plaintiff Endless River Technologies LLC and Defendant TransUnion LLC respectfully request that the Court grant this Motion and extend the pretrial motions deadline as set forth above.

DATED: August 30, 2022

/s/ Stephen J. Rosenfeld (with permission)

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2022, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Mark Premo-Hopkins

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Attorney for Defendant TransUnion LLC